

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Case No. 2:20-cv-00200-GAM

ALLEGHENY COUNTY EMPLOYEES')
RETIREMENT SYSTEM, Individually and)
And On Behalf of All Others Similarly Situated,)
Plaintiff,)
v.)
ENERGY TRANSFER LP, KELCY L.)
WARREN, JOHN W. MCREYNOLDS, and)
THOMAS E. LONG,)
Defendants.)

**JOINT STIPULATION AND [PROPOSED]
CASE SCHEDULING ORDER NUMBER 2**

Lead Plaintiff, consisting of the Allegheny County Employees' Retirement System, Employees' Retirement System of the City of Baton Rouge and Parish of East Baton Rouge, Denver Employees Retirement Plan, IAM National Pension Fund, and Iowa Public Employees' Retirement System (collectively, "Lead Plaintiff") and Defendants Energy Transfer LP, Kelcy L. Warren, John W. McReynolds, and Thomas E. Long ("Defendants" and collectively with Lead Plaintiff, the "Parties"), hereby jointly stipulate and propose as follows:

1. WHEREAS, on March 5, 2020, this Court entered Joint Stipulation and Case Scheduling Order Number 1 establishing, among other things, a deadline for Lead Plaintiff's filing of the Operative Complaint and a briefing schedule on any motion(s) to dismiss the Operative Complaint that may be filed by Defendants:

2. WHEREAS, Scheduling Order Number 1 was entered before a disaster emergency was declared in the Commonwealth of Pennsylvania due to the threat posed by COVID-19 and

similar disaster emergencies have been declared in States where counsel in this case who reside outside the Commonwealth of Pennsylvania are located; and

3. WHEREAS, in light of the present circumstances, the Parties believe that adjustments to Scheduling Order No. 1 would be appropriate;

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, subject to the Court's approval, as follows:

1. Lead Plaintiff shall file its Operative Complaint by June 15, 2020;

2. Defendants shall answer, move to dismiss, or otherwise respond to the Operative Complaint on or before August 14, 2020;

3. If Defendants file one or more motions to dismiss the Operative Complaint, Lead Plaintiff shall file its response in opposition to the dismissal motion or motions on or before October 5, 2020;

4. In the event Defendants file a motion or motions to dismiss, Defendants shall file their reply or replies on or before October 20, 2020.

5. Lead Plaintiff and Defendants reserve all rights and do not waive any rights through this stipulation, including their rights to seek adjournments or to seek amendments to any page limitations that would apply to any briefs contemplated by this stipulation, or further extensions of the above deadlines for good cause or as may be needed by future developments.

Dated: April 29, 2020

BARRACK, RODOS & BACINE

/s/ Jeffrey W. Golan

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IT IS SO ORDERED:

DATED: May 1, 2020

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HONORABLE GERALD A. MCHUGH
UNITED STATES DISTRICT JUDGE

